



CITY OF LODI COUNCIL COMMUNICATION

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AGENDA TITLE: Comment letter on City of Stockton Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the City of Stockton 2035 General Plan and Infrastructure Master Plan

MEETING DATE: July 20, 2005

PREPARED BY: Lynette Dias, Contract Planner

RECOMMENDED ACTION: Staff recommends that the City Council receive and file the staff's comment letter on the City of Stockton 2035 General Plan and Infrastructure Master Plans Environmental Impact Report (EIR) Notice of Preparation (NOP) and, if desired, provide comments and further direction to staff.

BACKGROUND INFORMATION: On May 27, 2005, the City received a Notice of Preparation (NOP) from the City of Stockton indicating its intent to prepare an Environmental Impact Report (EIR) for the 2035 General Plan and Infrastructure Master Plans. The NOP indicated that Stockton is planning to accommodate a 120 percent population growth over the next 30 years, increasing its population of 261,000 persons to approximately 576,000 persons by the year 2035. Typically, NOPs are general in nature because they are intended to elicit broad comments and questions for consideration in the preparation of the EIR. Correspondingly, staff's comments on the NOP focused primarily on issues related to this dramatic growth, related potential adverse impacts on the City of Lodi, and broader San Joaquin Valley community impacts. Staff forwarded on June 30, 2005 the attached comment letter regarding the EIR scope to the City of Stockton for consideration during the preparation of the Draft EIR for these plans. Due to the time constraints, this item was not presented to the City Council prior to the City sending the comment letter.

A brief overview of the concerns highlighted in the comment letter is provided below.

Generally, in order to accommodate a half-million person population, Stockton is proposing to change or intensify land use designations throughout the existing incorporated area, as well as to annex significant areas to the north, east, and south of its current City limits. The Preferred Alternative detailed in the NOP proposes that the northern boundary of Stockton's Sphere of Influence and Urban Service Boundary would be located approximately one mile south of Harney Lane immediately adjacent to the City of Lodi's southern sphere of influence boundary.

Stockton's intent is also to annex the area abutting the southern edge of the White Slough Water Pollution Control Facility and designate it with Residential Estate land uses. The comments submitted to Stockton note the incompatibility of the proposed residential use with the wastewater treatment facility, as well as the recent MOU agreement between Lodi and Stockton which requires the establishment a 500-foot buffer that would prohibit residential and commercial uses around this facility.

APPROVED:

A handwritten signature in black ink, appearing to read "Blair King".

Blair King, City Manager

Other growth related issues, discussed more fully in the attached letter, include:

- Degradation of the existing, scenic rural quality of the agricultural area surrounding Lodi from future Stockton growth;
- Impacts from increases in aircraft operations, noise, and hazards at the Stockton Municipal Airport as a result of 120-percent population growth;
- Impacts of future growth on the non-residential job market;
- Identification of rural roadways located *outside* of Stockton that will be impacted from new development *within* Stockton, but will not be improved (e.g., additional lanes) in order to accommodate Stockton's growth; and
- Discussion and remediation of local landfill capacity limitations.

For reference, Staff has attached Figures 2 and 3 of the NOP. A complete copy NOP may be viewed on line at www.westplanning.com/docs/stockton. The City will have an additional opportunity to comment more specifically on the proposed land use designation changes, policies, and impacts resulting from these plans after the City of Stockton releases the Draft EIR for public review. Should the City Council have other comments or desired actions at this time, the Council may direct staff as needed.

FISCAL IMPACT: Not Applicable.

FUNDING AVAILABLE: Not Applicable.

Attachment: Comment Letter on City of Stockton General Plan EIR NOP, dated June, 30, 2005.
Figures 2 and 3 of the Notice of Preparation of an EIR for the City of Stockton 2035 General Plan and Infrastructure Master Plan

cc: LSA Associates, Inc.

CITY COUNCIL

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BOB JOHNSON
JOANNE MOUNCE

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June 30, 2005

David Stagnaro, AICP, Senior Planner
City of Stockton, Planning Division
345 North El Dorado Street
Stockton, CA 95202

RE: Comments on Notice of Preparation for 2035 General Plan and Infrastructure Master Plans
Environmental Impact Report (EIR4-05)

Dear Mr. Stagnaro:

Thank you for providing the City of Lodi with the opportunity to comment on Stockton's Notice of Preparation (NOP) for the 2035 General Plan and Infrastructure Master Plans Environmental Impact Report (EIR). We apologize for being a few days late with our comments, but greatly appreciate your willingness to consider them when preparing this EIR.

We have attempted to systematically comment on the individual sections of the NOP as they occur in order to facilitate your review. The following comments are intended to identify areas that Lodi would appreciate additional analyses, discussion, or clarification of in the EIR beyond that required by CEQA or described in the Initial Study.

Project Description – The project description indicates that Stockton is planning to accommodate a 120-percent increase in population growth over the next 30 year period from 261,000 to 576,000 persons. It is unclear, however, if 2035 and a population of 576,000 persons is intended to be Stockton's build-out horizon, or if Stockton will continue to expand its urban edge until it directly abuts the surrounding incorporated jurisdictions. It would be helpful if the project description indicated what the community's vision is for Stockton once built-out, including anticipated build-out year and population, number and type of jobs it will provide, and its role in the broader San Joaquin Valley community.

Preferred Land Use Alternative

- Figure 2 incorrectly shades Lodi the same shade of pink indicated for the City of Lathrop in the legend.
- Table 2 neglects to provide existing land use acreages for the Planning Area and USB/SOI, as well as neglects to indicate existing and future land use acreages within the Stockton's city limits. Without this information, it is difficult to understand the magnitude of change proposed for each of these areas, as well as how much change each land use category will undergo in order to accommodate a ½-million person population.
- Table 2 and Figure 3 both neglect to provide proposed residential land use densities, as well as non-residential intensities (i.e., floor area ratios or number of jobs), which also makes it difficult to understand the proposed magnitude of change by 2035.

- Figure 3 indicates that Stockton intends to annex and develop the area abutting the southern edge of Lodi's wastewater treatment plant with Residential Estate land uses. The City of Lodi believes that residential uses are *not* compatible with a wastewater treatment facility. Further, consistent with the M.O.U. recently agreed upon by Lodi and Stockton, a 500-foot buffer should be indicated on Stockton's General Plan Land Use Map around Lodi's wastewater treatment plant, and should *not* designate this area for residential or commercial land uses.
- Figure 3 provides letter symbols within circles on various areas designated Residential Estate, but neglects to indicate what the various letter symbols indicate.

Alternative 1 (No Project - Build-out of existing General Plan) – Since Alternative 1 builds-out the existing General Plan, including an adopted Housing Element that plans for 2.5-percent annual residential growth through 2008, the anticipated population and number of jobs should be provided under this scenario, including the anticipated build-out horizon. This discussion should indicate how this reduction in growth will impact Stockton, as well as the broader San Joaquin Valley community.

Alternative 2 (Existing Growth Trends) – This alternative should evaluate the pros and cons of developing at a lower density/intensity pattern including preservation of existing community identity via maintaining a similar suburban development pattern as currently exists in Stockton's residential areas. Additionally, this alternative should indicate how much additional land area currently located outside of Stockton's city limits would be required in order to provide enough housing to support a population of ½-million persons.

Alternative 3 (Infill/Maximum Open Space) – This alternative should explore quality of life issues associated with increasing densities within the existing urban area, as well as clarifying why expansion of public services and infrastructure within the existing urban area is different than expansion of these services to undeveloped areas currently located outside the urban area.

General Comment Regarding Alternatives – None of the alternatives described in the NOP analyze a range of growth scenarios. Since Stockton has considered managing its residential growth by adopting a growth rate of 2.5-percent, it seems prudent that other ranges of growth in addition to a constant 2.5-percent annual increase should also be explored when planning 30-years into the future.

Aesthetics – This analysis should indicate how the degradation or impairment of the existing scenic quality from development of the Preferred Alternative impacts the existing rural nature and quality of the agricultural area surrounding Stockton and Lodi that will be converted to urban uses.

Hazards and Hazardous Materials – In analyzing the safety issues related to airport operations, Lodi requests that flight patterns and flying heights be included to disclose where potential aircraft related hazards and conflicts could occur.

Land Use and Planning – This section, in particular, needs to analyze the land use incompatibility issues associated with abutting Residential Estate uses next to Lodi's wastewater treatment plant.

Noise – Considering the extensive growth anticipated under the Preferred Alternative, this section should particularly analyze the impacts of inducing growth at the Stockton Municipal Airport in

terms of increased numbers of based and transient aircraft, type of aircraft using the airport, flight patterns, single noise event impacts from individual aircraft (particularly old jets), and average daily noise level impacts.

Population and Housing – In addition to analyzing housing and population impacts, this section should also evaluate impacts from future growth on the non-residential job market.

Traffic and Transportation – This analysis should identify which roadways outside of Stockton will be impacted from new development within Stockton, including analyzing how roadway improvements (e.g., additional lanes), in particular, identified to accommodate Stockton's anticipated growth will function when they cross outside of Stockton, including rural roadways that will not be improved to accommodate Stockton's growth.

Utilities and Service Systems - Lodi is concerned that Stockton will not be able to dispose of the solid waste generated by the Preferred Alternative land uses forcing it to rely on the North County landfill, which will in turn reduce Lodi's capacity for long term waste disposal at this landfill. This section should clarify how large a new landfill will need to be in order to accommodate Stockton's proposed growth, as well as indicate the siting, permitting, and operational feasibility of opening a new landfill in the vicinity.

General Comment – It is unclear where the associated impacts from the policies included in the Economic Development, Community Identity, and Youth and Education Elements will be evaluated in the EIR.

Thank you, again, for providing Lodi with the opportunity to comment on this NOP. We congratulate you on the progress you have made to date with this project, and wish you the best of luck as you continue with this significant and monumental project.

If you have any questions, please contact myself or City Attorney Steve Schwabauer at (209) 333-6700.

Sincerely,

Blair King
City Manager

cc: Lynette Dias, LSA Associates
Steve Schwabauer
Planning

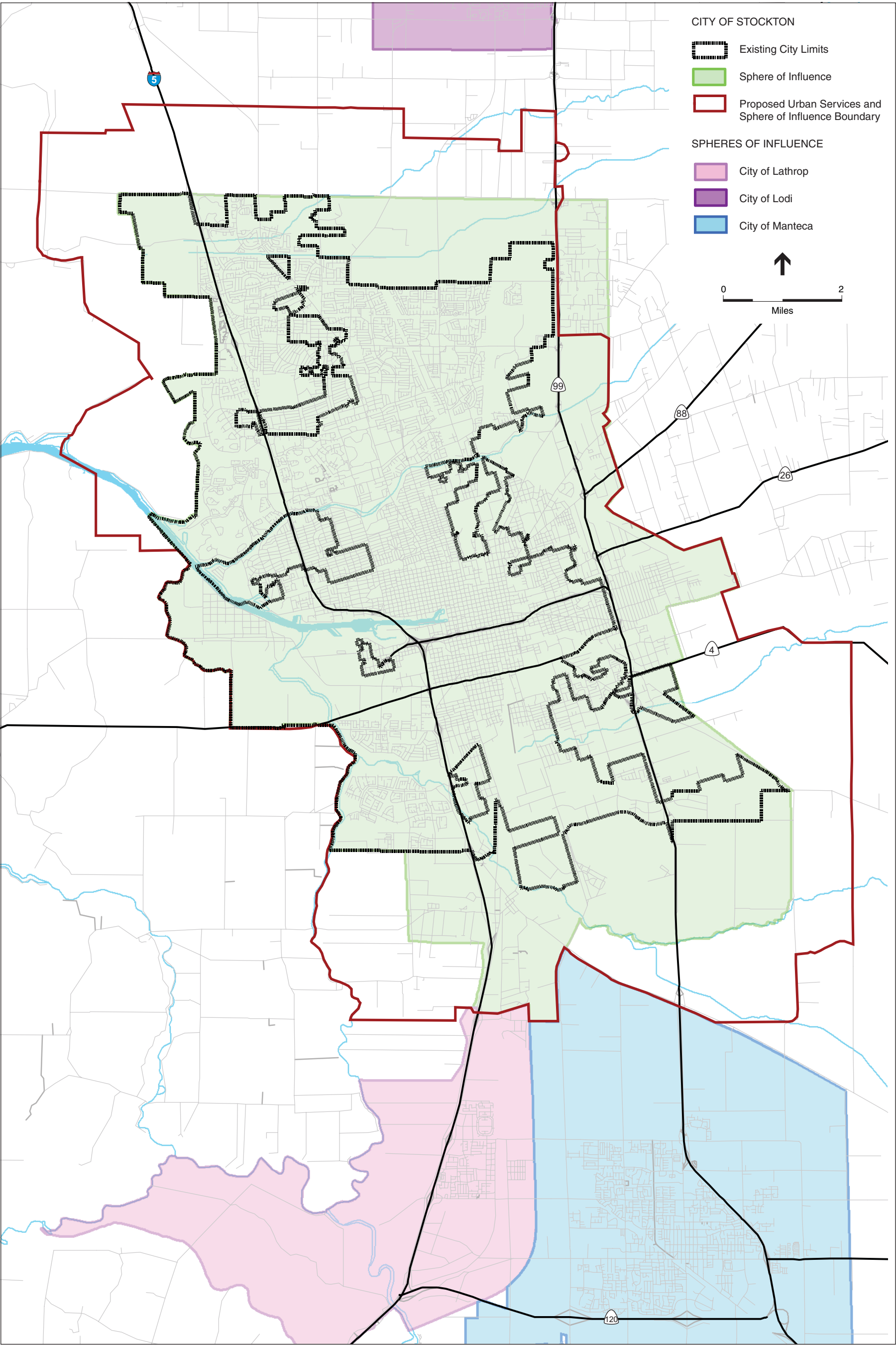
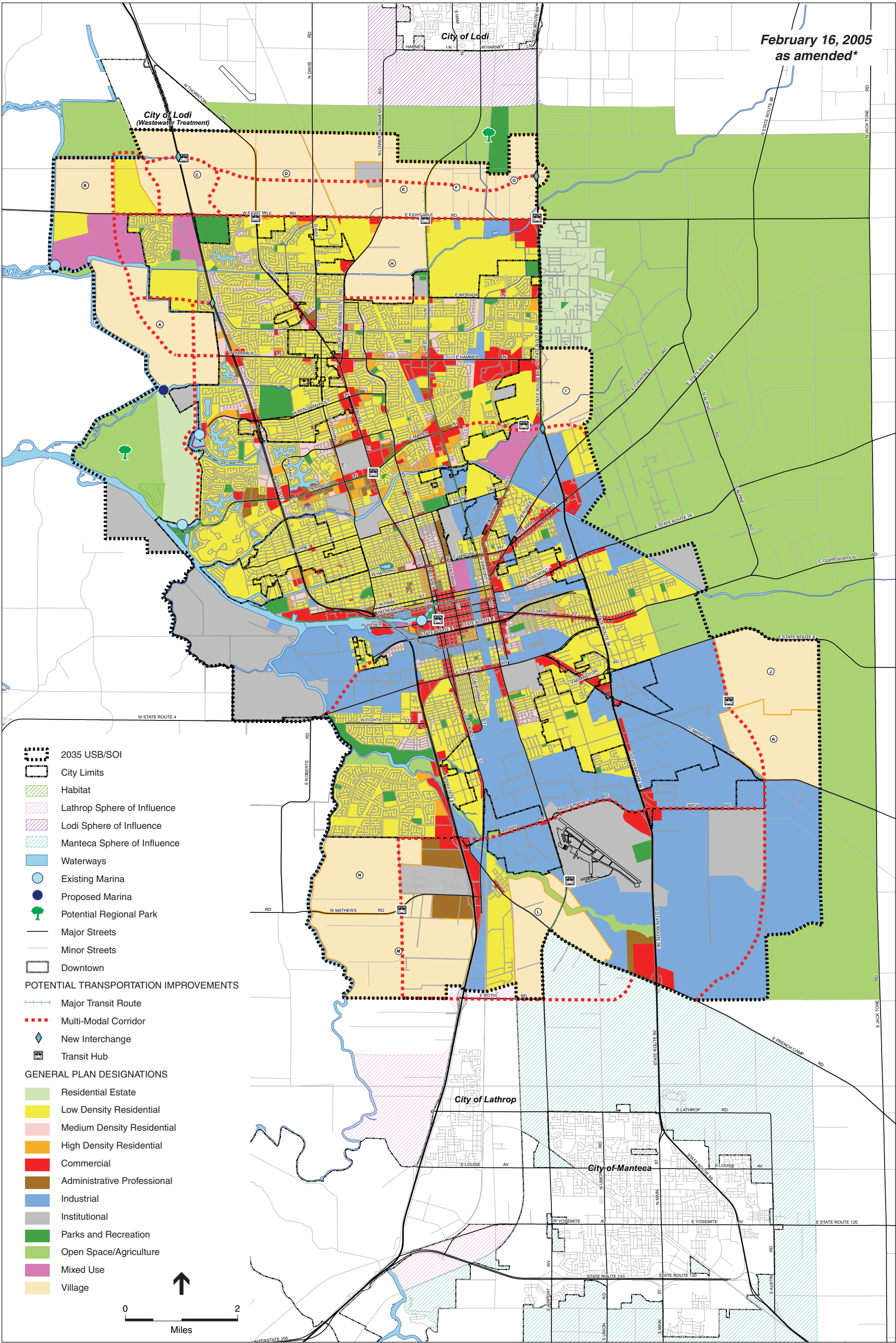


Figure 2
Existing and Proposed Jurisdictional Boundaries



SOURCE: Mintier & Associates, URS, and ESA, 2005

City of Stockton General Plan Update / 202593 ■

Figure 3
Study Area and Draft Land Use Diagram